

Fill in this information to identify the case:

Debtor 1 JOEL LEE REECE

Debtor 2 CAROLYN SUE REECE  
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania

Case number 1:20-bk-02293-HWV

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: Freedom Mortgage Corporation

Court claim no. (if known):

9

Last 4 digits of any number you use to identify the debtor's account: 0042

Property address: 623 Mohawk Road

Number Street  
Newville, PA 17241  
City      State      ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 08/01/2025  
MM/DD/YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/DD/YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/Mario Hanyon Date 07/31/2025  
Signature

Print Mario Hanyon Title Attorney  
First Name                    Middle Name                    Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.  
Number                    Street

Winston-Salem, NC 27103  
City                    State                    ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Harrisburg Division*

IN RE: <u>JOEL LEE REECE AND CAROLYN SUE REECE</u>	Case No. 1:20-bk-02293-HWV Chapter 13
Freedom Mortgage Corporation, Movant	
vs.  JOEL LEE REECE AND CAROLYN SUE REECE, Debtors	

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Kara Katherine Gendron, Debtor's Attorney  
125 State Street  
Harrisburg, PA 17101  
karagendron@gmail.com

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

United States Trustee, US Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102

Via First Class Mail:

Joel Lee Reece  
623 Mohawk Rd  
Newville, PA 17241

Carolyn Sue Reece  
623 Mohawk Rd  
Newville, PA 17241

Date: July 31, 2025

*/s/Mario Hanyon*

Andrew Spivack, PA Bar No. 84439  
Mario Hanyon, PA Bar No. 203993  
Ryan Srnik, PA Bar No. 334854  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
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